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NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

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October 1, 2003

First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Progress Report 53 (September 2003)**

Dear Mr. Bradley:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the "site"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") to provide the U.S. Environmental Protection Agency ("EPA") with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, the remedial action for groundwater, and operation and maintenance activities that were performed during September 2003.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- On September 2, 2003, the Group's project coordinator issued a progress report to EPA.
- On September 9, 2003, the Group's project coordinator provided to EPA two copies of the report entitled "Five-Year Review Final Report for the NL Industries/Taracorp Superfund Site, Granite City, Illinois" ("Five-Year Review Final Report"). The report, prepared by ENTACT for the Group, presented the results of soil sampling performed by ENTACT in conjunction with EPA's five-year review and the results of an inspection of the main industrial property conducted by ENTACT in June 2003.
- On September 12, 2003, the Group's project coordinator issued to EPA three copies of Appendix B to the 2003 Annual Groundwater Monitoring Report, NL Industries/Taracorp Superfund Site. The Appendix B groundwater data was inadvertently omitted from the report when the report was originally submitted to EPA in August 2003.



- On September 12, 2003, the Group's project coordinator provided a letter to Mr. John Orlashik, National Steel Corporation, which included laboratory data reports from the testing of groundwater samples collected by ARCADIS in March 2003 in conjunction with the 2003 annual groundwater monitoring event. The information provided to Mr. Orlashik included laboratory data reports for groundwater sampled collected from monitoring wells 115 (shallow and deep), 124 (shallow and deep), and 125 located on National Steel Corporation property in Granite City, Illinois.
- On September 30, 2003, the Group's project coordinator provided a letter to EPA which included a completed log sheet documenting the results of ENTACT's operation and maintenance inspection at the site on June 24, 2003. The letter also indicated that the Group had recently authorized ENTACT to conduct maintenance activities at the site, including demolition of structures on the former BV&G Trucking property, to address the results of the inspection.

2. Summary of Data and/or Results of Sampling and Tests Received:

- As noted above, the results of soil sampling conducted at the site by ENTACT in conjunction with EPA's five-year review were submitted to EPA on September 9, 2003 as part of the Five-Year Review Final Report.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:

- As noted above, the Five-Year Review Final Report was submitted to EPA on September 9, 2003.
- Also as noted above, Appendix B to the 2003 Annual Groundwater Monitoring Report for the site was issued to EPA on September 12, 2003.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- As previously noted, the Group recently authorized ENTACT to perform maintenance activities at the site to address the items outlined in ENTACT's June 24, 2003 inspection report. Upon receipt from ENTACT, the Group's project coordinator will advise EPA regarding ENTACT's schedule for performing the maintenance activities.

- In April 2003, Group representatives issued letters to EPA to: (1) request EPA's written certification pursuant to Section 48(b) of the Consent Decree to confirm that the Group has completed remedial action at the site; (2) request clarifications regarding the Supplemental Environmental Project; (3) request EPA's approval for the Madison County Community Development Agency to submit the draft work plan for the Supplemental Environmental Project to EPA by July 19, 2003; (4) request EPA's approval to reduce the amount of financial security for the site; (5) request EPA's written confirmation that Johnson Controls' 2002 Annual Report is sufficient to demonstrate the Group's financial ability to complete the remaining work at the site; and to (6) request EPA's written confirmation that it is not necessary for the Group to maintain comprehensive general liability insurance and automobile liability insurance pursuant to the Consent Decree because remedial activities have been completed at the site. The Group will address EPA's responses, as required, upon receipt.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

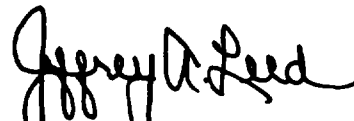
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

Mr. Brad Bradley

October 1, 2003

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cc: Ms. Sandra Bron - Illinois EPA (by first class mail)
Mr. Jack Kratzmeyer - ARCADIS (by first class mail)
Mr. Rich Wood - ENTACT, Inc. (by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(by first class mail)